



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37384-2000

October 14, 2004

TVA-SQN-TS-04-08

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Gentlemen:

| | | |
|----------------------------|---|--------------------|
| In the Matter of |) | Docket Nos. 50-327 |
| Tennessee Valley Authority |) | 50-328 |

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - TECHNICAL SPECIFICATIONS (TS) CHANGE 04-08, "APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS TO PROVIDE MONTHLY OPERATING REPORTS AND OCCUPATIONAL RADIATION EXPOSURE REPORTS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)"

Pursuant to 10 CFR 50.90, Tennessee Valley Authority (TVA) is submitting a request for a TS change (TS 04-08) to Licenses DPR-77 and DPR-79 for SQN Units 1 and 2.

The proposed amendment would delete the TS requirements to submit monthly operating reports and annual occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the *Federal Register* on June 23, 2004, as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides a description of the proposed change and confirmation of applicability. Enclosure 2 provides the existing TS pages marked-up to show the proposed change.

2001

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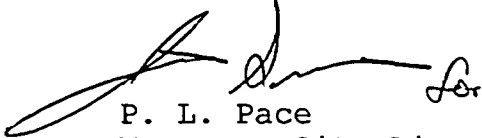
In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated Tennessee Official.

TVA requests approval of the proposed License Amendment by December 3, 2004, to support the incorporation of the monthly data into the consolidated data entry for calendar year 2005. This amendment will be implemented within 45 days of NRC approval.

There are regulatory commitments contained in Section 6.1 of Enclosure 1. If you have any questions about this change, please contact me at 843-7170 or Jim Smith at 843-6672.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14th day of October, 2004.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. L. Pace', is written over the typed name.

P. L. Pace
Manager, Site Licensing
and Industry Affairs

Enclosures:

1. TVA Evaluation of the Proposed Changes
2. Proposed Technical Specifications Changes (mark-up)
3. List of Regulatory Commitments

cc: See page 3

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Enclosures

cc (Enclosures):

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ATTN: Mr. Frank Masseth .

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401 Church Street
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Rockville, Maryland 20852-2739

ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA) SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2

Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) 6.9.1.4 for an annual report on occupational radiation exposures and TS 6.9.10 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this TS improvement was announced in the *Federal Register* on June 23, 2004, as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

| | |
|---|---------|
| TS 6.9.1.4 Occupational Radiation Exposure Report | Deleted |
|---|---------|

| | |
|--------------------------------------|---------|
| TS 6.9.1.10 Monthly Operating Report | Deleted |
|--------------------------------------|---------|

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

TVA has reviewed the safety evaluation (SE) published on June 23, 2004, (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. TVA has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to SQN Units 1 and 2 and justify this amendment for the incorporation of the changes to the SQN TSs.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004, (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the *Federal Register* on June 23, 2004, (69 FR 35067) for this TS improvement, TVA is making the following regulatory commitment:

1. TVA is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry [CDE] program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems [monthly operating reports and CDE]).
2. SQN does not have different reactor types or both operating and shutdown reactors.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

TVA has reviewed the proposed no significant hazards consideration determination published on June 23, 2004, (69 FR 35067) as part of the CLIIP. TVA has concluded that the proposed determination presented in the notice is applicable to SQN and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

TVA has reviewed the environmental evaluation included in the model SE published on June 23, 2004, (69 FR 35067) as part of the CLIIP. TVA has concluded that the staff's findings presented in that evaluation are applicable to Sequoyah and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. TVA is not proposing variations or deviations from the TS changes described in TSTF-369 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2

Proposed Technical Specification Changes (mark-up)

I. AFFECTED PAGE LIST

Unit 1

6-11
6-12
6-13

Unit 2

6-11
6-13

II. MARKED PAGES

See attached.

ADMINISTRATIVE CONTROLS

j. Technical Specification (TS) Bases Control Program

This program provides a means for processing changes to the Bases of TSs.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 1. A change in the TS incorporated in the license or
 2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 6.8.4.j.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 DELETED

6.9.1.2 DELETED

6.9.1.3 DELETED

ANNUAL REPORTS ^{1/}

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

~~6.9.1.5 Reports required on an annual basis shall include a tabulation on an annual basis for the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions - reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance~~

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

~~^{2/} This tabulation supplements the requirements of § 20.2206 of 10 CFR Part 20.~~

DELETE

ADMINISTRATIVE CONTROLS

~~(describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.~~

DELETED

ADD

DELETE

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT^{1/}

6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

6.9.1.7 (Relocated to the ODCM.)

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^{1/}

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

6.9.1.9 (Relocated to the ODCM or PCP.)

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

ADD

DELETE

MONTHLY REACTOR OPERATING REPORT

6.9.1.10 ~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

DELETED

CORE OPERATING LIMITS REPORT

6.9.1.14 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

1. $f_1(\Delta I)$ limits for Overtemperature Delta T Trip Setpoints and $f_2(\Delta I)$ limits for Overpower Delta T Trip Setpoints for Specification 2.2.1.
2. Moderator Temperature Coefficient BOL and EOL limits and 300 ppm surveillance limit for Specification 3/4.1.1.3,
3. Shutdown Bank Insertion Limit for Specification 3/4.1.3.5,
4. Control Bank Insertion Limits for Specification 3/4.1.3.6,
5. AXIAL FLUX DIFFERENCE Limits for Specification 3/4.2.1,
6. Heat Flux Hot Channel Factor and $K(z)$ for Specification 3/4.2.2, and
7. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3.

6.9.1.14.a The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by NRC in:

1. BAW-10180P-A, Rev. 1, "NEMO - NODAL EXPANSION METHOD OPTIMIZED", March 1993. (FCF Proprietary)
(Methodology for Specification 3.1.1.3-Moderator Temperature Coefficient)
2. BAW-10169P-A, "RSG PLANT SAFETY ANALYSIS - B&W SAFETY ANALYSIS METHODOLOGY FOR RECIRCULATING STEAM GENERATOR PLANTS", October 1989. (FCF Proprietary)
(Methodology for Specification 3.1.1.3-Moderator Temperature Coefficient)
3. BAW-10163P-A, Core Operating Limit Methodology for Westinghouse-Designed PWRs, June 1989. (FCF Proprietary)
(Methodology for Specification 2.2.1, - Limiting Safety System Settings [$f_1(\Delta I)$, $f_2(\Delta I)$ limits], 3.1.3.5 - Shutdown Bank Insertion Limits, 3.1.3.6 - Control Bank Insertion Limits, 3/4.2.1 - Axial Flux Difference, 3/4.2.2 - Heat Flux Hot Channel Factor, 3/4.2.3 - Nuclear Enthalpy Rise Hot Channel Factor)
4. BAW-10168P-A, Rev. 2, RSG LOCA - B&W Loss of Coolant Accident Evaluation Model for Recirculating Steam Generator Plants, (FCF Proprietary)
(Methodology for Specification 3/4.2.2 - Heat Flux Hot Channel Factor)
5. BAW-10168P-A, Rev 3, RSG LOCA - B&W Loss of Coolant Accident Evaluation Model for Recirculating Steam Generator Plants, (FCF Proprietary)
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ADMINISTRATIVE CONTROLS

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ADMINISTRATIVE CONTROLS

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ENCLOSURE 3

**TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2**

COMMITMENT LIST

TVA will revise the UFSAR to add a Regulatory Commitment to provide to NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry [CDE] program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems [monthly operating reports and CDE]).